

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
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S.D. OF N.Y.

PATRICIA ADDLOFENZ

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

TISHMAN CONSTRUCTION CORP

AECOM 335

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. The names listed above must be identical to those contained in Section I.

17CV9000

EMPLOYMENT DISCRIMINATION COMPLAINT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. PARTIES**A. Plaintiff Information**

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

PATRICIA A LORENZ
 First Name Middle Initial Last Name
11 LAWRENCE ROAD
 Street Address
DEER PARK NY 11729
 County, City State Zip Code
6469967023 cranelady14@optonline.net
 Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. (Proper defendants under employment discrimination statutes are usually employers, labor organizations, or employment agencies.) Attach additional pages if needed.

Defendant 1: TISHMAN CONSTRUCTION CORP OF NEW YORK
 Name
100 PARK AVE
 Address where defendant may be served
NEW YORK NEW YORK 10017
 County, City State Zip Code

Defendant 2: AECOM
 Name
555 FLOWER ST Suite 3700
 Address where defendant may be served
LOS ANGELES CA 90071
 County, City State Zip Code

Defendant 3:

Name

Address where defendant may be served

County, City

State

Zip Code

II. PLACE OF EMPLOYMENT

The address at which I was employed or sought employment by the defendant(s) is:

1 WORLD TRADE CENTER

Name

Address

New York

NY

County, City

State

Zip Code

III. CAUSE OF ACTION**A. Federal Claims**

This employment discrimination lawsuit is brought under (check only the options below that apply in your case):

- ☒ **Title VII of the Civil Rights Act of 1964**, 42 U.S.C. §§ 2000e to 2000e-17, for employment discrimination on the basis of race, color, religion, sex, or national origin

The defendant discriminated against me because of my (check only those that apply and explain):

- ☐ race: _____
- ☐ color: _____
- ☐ religion: _____
- ☒ sex: SEXUAL HARASSMENT.
- ☐ national origin: _____

- ☐ **42 U.S.C. § 1981**, for intentional employment discrimination on the basis of race

My race is: _____

- ☐ **Age Discrimination in Employment Act of 1967**, 29 U.S.C. §§ 621 to 634, for employment discrimination on the basis of age (40 or older)

I was born in the year: _____

- ☐ **Rehabilitation Act of 1973**, 29 U.S.C. §§ 701 to 796, for employment discrimination on the basis of a disability by an employer that constitutes a program or activity receiving federal financial assistance

My disability or perceived disability is: _____

- ☐ **Americans with Disabilities Act of 1990**, 42 U.S.C. §§ 12101 to 12213, for employment discrimination on the basis of a disability

My disability or perceived disability is: _____

- ☐ **Family and Medical Leave Act of 1993**, 29 U.S.C. §§ 2601 to 2654, for employment discrimination on the basis of leave for qualified medical or family reasons

B. Other Claims

In addition to my federal claims listed above, I assert claims under:

- ☒ **New York State Human Rights Law**, N.Y. Exec. Law §§ 290 to 297, for employment discrimination on the basis of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status
- ☒ **New York City Human Rights Law**, N.Y. City Admin. Code §§ 8-101 to 131, for employment discrimination on the basis of actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status
- ☐ Other (may include other relevant federal, state, city, or county law):

IV. STATEMENT OF CLAIM

A. Adverse Employment Action

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☐ did not hire me
- ☒ terminated my employment
- ☐ did not promote me
- ☐ did not accommodate my disability
- ☐ provided me with terms and conditions of employment different from those of similar employees
- ☒ retaliated against me
- ☒ harassed me or created a hostile work environment
- ☐ other (specify): _____

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) *because of* your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

SEE ATTACHED SHEETS

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

V. ADMINISTRATIVE PROCEDURES

For most claims under the federal employment discrimination statutes, before filing a lawsuit, you must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) and receive a Notice of Right to Sue.

Did you file a charge of discrimination against the defendant(s) with the EEOC or any other government agency?

☒ Yes (Please attach a copy of the charge to this complaint.)

When did you file your charge? _____

☐ No

Have you received a Notice of Right to Sue from the EEOC?

☒ Yes (Please attach a copy of the Notice of Right to Sue.)

What is the date on the Notice? _____

When did you receive the Notice? _____

☐ No

VI. RELIEF

The relief I want the court to order is (check only those that apply):

☒ direct the defendant to hire me

☐ direct the defendant to re-employ me

☐ direct the defendant to promote me

☐ direct the defendant to reasonably accommodate my religion

☐ direct the defendant to reasonably accommodate my disability

☒ direct the defendant to (specify) (if you believe you are entitled to money damages, explain that here)

MONEY DAMAGES FOR LOSS OF PAY AND FOR DIFFERENCE
IN PAY THAT I EARNED WHILE I WAS EMPLOYED BY
DEFENDENT AND WHAT I'M MAKING NOW, ALSO DAMAGES
FOR MENTAL ANGUISH AND PAIN AND SUFFERING.

VII. PLAINTIFF'S CERTIFICATION

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

11/16/2017		Patricia Lorenz	
Dated		Plaintiff's Signature	
PATRICIA	A	LORENZ	
First Name	Middle Initial	Last Name	
11 LAURENCE ROAD			
Street Address			
DEER PARK	NY	11729	
County, City	State	Zip Code	
646-996-7023	CRANKY14@optonline.net		
Telephone Number	Email Address (if available)		

I have read the attached Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

EEOC Form 161-B (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Patricia Lorenz
41 Lawrence Road
Deer Park, NY 11729

From: New York District Office
33 Whitehall Street
5th Floor
New York, NY 10004

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2014-00881

Lawrence M. Angelo,
Investigator

(617) 565-3190

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☒

More than 180 days have passed since the filing of this charge.

☐

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



Feng K. An,
Area Office Director

Enclosures(s)

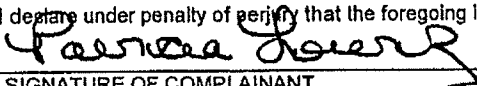
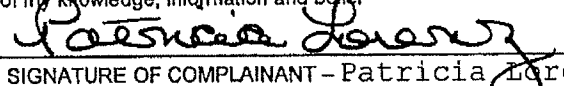

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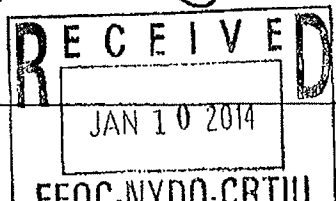
(Date Mailed)

cc: Gena Usenheimer, Esq.
Seyfarth Shaw, LLP
620 Eighth Avenue
New York, NY 10018

Kim Berg, Esq.
GOULD & BERG, LLP
222 Bloomingdale Road
White Plains, NY 10605

520-2014-00881

CHARGE OF DISCRIMINATION			ENTER CHARGE NUMBER
This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse before completing this form			<input type="checkbox"/> FEPA <input type="checkbox"/> EEOC
NEW YORK STATE DIVISION OF HUMAN RIGHTS			and EEOC
(State or local Agency, if any)			
NAME (Indicate Mr., Ms. or Mrs.) Ms. Patricia Lorenz	DOB: 6-6-70 SSN: 562-43-7408	HOME TELEPHONE NO. (Include Area Code) 646-996-7023	
STREET ADDRESS 11 Lawrence Road	CITY, STATE AND ZIP CODE Deer Park, NY 11279	COUNTY Suffolk	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME Tishman Construction Corp. of New York	NO. OF EMPLOYEES/MEMBERS 1000+	TELEPHONE NUMBER (Include Area Code) 212-973-9999	
STREET ADDRESS 100 Park Avenue	CITY, STATE AND ZIP CODE New York, NY 10017		
NAME Tishman Construction Corp.	STREET ADDRESS same	CITY, STATE AND ZIP CODE same	
NAME AECOM	STREET ADDRESS 555 South Flower St Suite 3700	CITY, STATE AND ZIP CODE Los Angeles, CA 90071	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> OTHER (Specify)			DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (Month, day, year) 2013
THE PARTICULARS ARE (If additional space is needed attach extra sheet(s)): <p>Respondent AECOM is a Delaware Corporation with its corporate headquarters located at the above address in Los Angeles, California. AECOM has national and international offices and serves clients in more than 140 countries around the world. AECOM delivers program and construction management services, from project concept to completion and commission. Respondents Tishman Construction Corp. of New York and Tishman Construction Corp. are both Delaware Corporations who leads the program and construction management services aspect of AECOM's business operations.</p> <p>Tishman Construction is one of the world's leading builders. Respondent Tishman provides a wide range of construction and construction related services, including iconic projects such as rebuilding ground zero in which they are involved as project manager for the World Trade Center buildings, transportation hub, retail component, site and streetscape design. As such, Respondent Tishman provides management and site supervision for the World Trade Center project. Essentially acting as the general contractors on site, Respondents have full authority and control over the various unionized workers at the site, including steamfitters, carpenters, plumbers, iron workers, etc.</p> <p style="text-align: center;">SEE RIDER A ATTACHED FOR CONTINUATION OF THE PARTICULARS</p>			
xx I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the foregoing is true and correct.  SIGNATURE OF COMPLAINANT PATRICIA LORENZ		NOTARY (When necessary to meet State and Local Requirements) I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.  SIGNATURE OF COMPLAINANT - Patricia Lorenz SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month and year) 11/9/2014  Notary Public KIM BERG Notary Public, State of New York Qualified in Rockland County Reg. No. 02BE5061682 Commission Expires September 19, 2014	



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"RIDER A" TO CHARGE OF DISCRIMINATION BY PATRICIA LORENZ

I commenced working for Respondents in 2008. I was a member of a union known as Local 14.

In or about 2010 I returned to work for Respondents after a medical leave of absence due to blood clots in my legs and was assigned as an Operating Engineer to operate the freight elevator car. Since that time, my job duties and responsibilities have been to operate one of twelve lever style elevator cars - which is essentially a steel cage that is used to transport workers and materials up and down the buildings.

Throughout my employment with Respondents, I have been the subject of unwanted, continuous and repeated acts of harassment, intimidation, bullying and retaliation on account of my gender. These acts commenced in or about 2010 and continued on a frequent and on-going basis to present. I have filed numerous verbal complaints to my supervisor Kenny Klemens, the "safety officers" Ryan and Dion, and to Tishman's HR personnel.

Throughout my employment I have been regularly subject to lewd and demeaning comments about my breasts, nails, clothing, and physical appearance. I have also subjected to daily unwanted touching from male workers on site who, despite my verbal objections for them not to touch me, would touch, push, shove and even spit on me. In addition, they would purposefully crowd the chair that I sat in inside the elevator car. Wads of gum would be stuck to my seat so that if I sat it would stick to my pants. In addition, one male worker aggressively slammed my chair and the elevator car itself with a jack.

Upon my return to work in 2010 the "shanty" that was erected for purposes of make-shift female locker room was broken into and my belongings were stolen and never returned. Just prior to my return, when I asked when I could go back to work the response I received from a fellow engineer was "hopefully not."

In the winter of 2011-2012, my brand new union safety jacket was defaced with vulgarity. Specifically, another worker wrote "I Love (depicted with a heart) cock" across the jacket. As I did not know that was written on the jacket I continued to wear it while being made fun of behind my back throughout the day. When it was pointed out to me by a co-worker, I was so upset I had to leave the jobsite.

I immediately complained to my bosses, Kenny Klemens and Mike Panelli, about this awful act. I also met with Tishman's HR representative to advise her of what had occurred with the jacket and about the regular acts of hostile behavior from male workers who were regularly making unwanted, lewd and demeaning comments about by nails, clothes, weight and breasts. I told her I wanted them to stop touching me, commenting and to leave me alone. I was advised by Respondent's HR Representative that they would remedy these problems. Contrary to this assurance, to my knowledge, nothing was ever done. The hostile work environment continued unabated thereafter. I was never advised of any investigation that was conducted nor any remedial action being taken. Although Respondent took the defaced jacket from me that day, I never got it back and was never reimbursed for its cost.

In addition to my complaint, upon information and belief, a male co-worker who operated elevator freight cars also complained to the

Supervisor, Kenny Klemens, about the harassment against me that was routinely handed out by the male workers on the job site.

In or about 2012 I learned that male workers defaced the plywood walls of the men's bathrooms by writing statements about me and drawing pictures depicting me that were offensive, vulgar, and which were clearly motivated by my gender. Upon information and belief, the bathrooms were used by Respondents' management personnel on a routine basis and thus they were aware of these unlawful acts.

For example, there was a drawing of someone holding my ponytail with his penis in my mouth and another depicting anal sex. Another drawing was created of a naked female on her hands and knees stating "Fuck my Dirty Hole" with the name "Patty" and the words "Do ya think her breath smells worse than her snatch" next to the drawing.

Numerous written sexual, gender based, and derogatory statements were placed on the walls about me, including but not limited to:

- "Smells like a cunt, looks like a cunt, acts like a cunt, her father is a cunt, her mother is a cunt, she's a cunt. P.S. Fuck you and your pink mat, bitch ass cunt";
- "The elevator cunt is an asshole"
- "Elevator cunt with big tits" with dollar signs
- "Patty is a cunt is not nice" with dollar signs and a smiley face
- "The elevator cunt is an asshole She is hot not" with dollar signs.
- "Patti is a CUNT!"
- "Ele[vator] chick suck dick and are part of N.A.B.MLA" which was then followed with "N.A.M.B.L.A. asshole."
- "Patty is a cunt with cannon ball tits" next to a drawing of a woman's breasts.

When I learned of the existence of these offensive writings, I complained. I repeated this complaint on several occasions to the site's safety personnel (Ryan and Dion) but nothing was done.

Then, in or about late January 2013, this job site was the subject of various media reports characterizing the job site as the "Tower of Hate". The media reported racist and sexist graffiti covered the walls at the site and included numerous photographs. One such article in the Daily News on January 27, 2013, ended with an accurate summary of a depiction that highlighted the underlying gender discriminatory motive behind this unabated hostile work environment: "'Women don't belong in construction!' one sexist rant read. 'Maybe painting, that's it. Then who's gonna (perform a sex act on) us?'"

Upon information and belief, in response to the negative media coverage, Respondents issued a form letter to workers indicating in substance that this type of behavior would not be tolerated. This letter literally had no effect and the hostile environment, including the drawings and statements about me, continued unabated. In fact, the portion of the "graffiti" on the walls which contained racially derogatory comments and slurs was painted over by Respondents so that it was covered up. However, Respondents intentionally did not cover up all of the derogatory and hostile statements and drawings about me. In addition, statements were added immediately to the walls stating, *inter alia*, "Ha ha ha I could still write on the wall. Me too" and still attacking me "The elevator cunt is an asshole" and using

gender based terms "Can't believe how much of a cunt Patti is". By way of another example, statements were written of a sexual nature as well on the walls that I had "a big mouth to match her big tits" with a hand drawn picture of two breasts.

Also after I complained about the graffiti, and after this article was published about the "Tower of Hate", I was the subject of further and escalated acts of harassment and retaliation which were clearly aimed at scaring me into quitting my job as they threatened my career, my physical safety and mental well being.

For example, on or about February 25, 2013, I was falsely accused of being intoxicated upon my arrival to work that morning. Despite my protestations, I was sent home and issued a written warning. My belief is that Respondents were setting in a motion a plan to remove me from the job site and/or force me to leave on false allegations of misconduct or incompetence.

In addition, one male worker yanked on the elevator car door so hard as I was just starting to open it that he injured my left shoulder.

Then when I was out of work due to illness (recurring blood clots in my legs) men on the job made comments that they hope I died, they hope the bitch doesn't come back, and that she's a piece of shit. Despite my recurring medical condition I was never provided lighter assignments - which was unlike many male workers who were given lighter assignments (such as starting up machines or compressors, operating the newer elevators that had buttons instead of a lever system that had to be manually operated).

On or about May 16, 2013, the same male worker who injured my arm took out a knife and simulated slicing his throat while staring at me.

On May 22, 2013, another male worker broke the chair in the elevator car that was there for me to sit on while performing my job duties and responsibilities.

On June 20, 2013, I was locked inside the women's bathroom which was in very close proximity to explosives.

As a result, on June 24, 2013, I again met with Respondent's manager Kenny Klemens and HR representatives to register another complaint regarding the discriminatory treatment. Following my meeting with HR, two dead rats were on my personal vehicle sending me the clear message that they viewed my complaints as ratting on them and there were going to be further retaliatory ramifications as a result.

Two days later, on June 26, 2013, my backpack was stolen from the elevator car. It had all of my personal belongings, including credit cards, keys and identification. I made a complaint to the Port Authority Police of which my managers were aware. A site wide search was conducted and the backpack was said to be located at the dock. However, when I got to the dock the backpack had already been moved and found 6 hours later on the 102nd floor. That same day when I attempted to go into the "shanty" I discovered that the lock was glued shut and I could not enter.

Thus, on July 2, 2013 I again met with Tishman's HR representatives to advise them that the environment continued to remain hostile and intolerable. Instead of taking effective remedial action to end the harassment, in response Respondent's representatives told me they could move me to another job. I advised them that I was not going to quit my current job. I reiterated to them my prior complaints about the unwanted physical touching, the lewd and vulgar comments, and *inter alia*, the male employee who destroyed my chair and made a threatening

gesture with a knife. Although they indicated they would address the problem. To date, I am unaware of any investigation that was conducted into my numerous complaints. Upon information and belief, the elevator car operator who operated the car adjacent to mine was never questioned about the acts of harassment he witnessed.

Although I heard rumors that some form of sensitivity training was provided to some workers it is important to note that none was ever provided to me.

Many of the male workers who were harassing me now treat me like a pariah and make on-going comments to their co-workers that "she's a bitch." Although I have been out of work since October 2013 due to recurring blood clots in my legs, I am scheduled to return in February 2014 and fear that the hostile, discriminatory and retaliatory work environment will continue unabated as it has for years.

On the basis of the foregoing, I charge Respondents with a continuing violation of my rights to be free from a hostile work environment and discrimination on account of my gender and retaliation for having opposed discriminatory practices under Title VII and the New York State Executive Law.

CHARGE OF DISCRIMINATION

 ENTER CHARGE
NUMBER
520-2014-00881
☐ FEPA
XX EEOC

This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse before completing this form

NEW YORK STATE DIVISION OF HUMAN RIGHTS

and EEOC

(State or local Agency, if any)

NAME (Indicate Mr., Ms. or Mrs.)

Ms. Patricia Lorenz

DOB: 6-6-70

SSN: 562-43-7408

HOME TELEPHONE NO. (Include Area Code)

646-996-7023

STREET ADDRESS

11 Lawrence Road

CITY, STATE AND ZIP CODE

Deer Park, NY 11279

COUNTY

Suffolk

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Tishman Construction Corp. of New York

NO. OF EMPLOYEES/MEMBERS

1000+

TELEPHONE NUMBER (Include Area Code)

212-973-9999

STREET ADDRESS

100 Park Avenue

CITY, STATE AND ZIP CODE

New York, NY 10017

NAME

Tishman Construction Corp.

CITY, STATE AND ZIP CODE

same

TELEPHONE NUMBER (Include Area Code)

same

NAME

AECOM

STREET ADDRESS

555 South Flower St
Suite 3700

CITY, STATE AND ZIP CODE

Los Angeles, CA 90071

TELEPHONE NUMBER (Include Area Code)

213-593-8000

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE ☐ COLOR XX SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☐ AGE XX RETALIATION XX OTHER (Specify) Disability

DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (Month, day, year)

January 13, 2014

THE PARTICULARS ARE (if additional space is needed attach extra sheet(s)):

On January 9, 2014 I filed by overnight mail a Charge of Discrimination against the above listed Respondents, Charge No. 520-2014-00881. At that time, I had been on a medical leave of absence for a few months and was scheduled to return to work in early February 2014.

On January 13, 2014 I contacted my union hall to discuss my return to work for Tishman. I was advised that my position no longer existed as Tishman had taken down my machine (referring to Tishman shutting the outside shaft/elevator car which I had been assigned to operate prior to my leave). Upon information and belief, the other two elevator cars operating next to mine were closed and the one remaining open car was filled by Tishman choosing a male employee with less seniority (Phil McPaul).

*****SEE ATTACHED ADDENDUM A FOR ADDITIONAL PARTICULARS*****

xx I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

 SIGNATURE OF COMPLAINANT
PATRICIA LORENZ

NOTARY-(When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief

SIGNATURE OF COMPLAINANT - Patricia Lorenz

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month and year) May 1, 2014

Notary Public

KIM BERG

 Notary Public, State of New York
Qualified in Rockland County
Reg. No. 02BE5061682

Commission Expires September 13, 2014

ADDENDUM A TO SUPPLEMENT TO EEOC CHARGE OF PATRICIAL LORENZ
CHARGE NO. 520-2014-00881

Past practice and union policy required companies like Tishman to follow seniority in laying off workers and in hiring back workers who were out of work due to either lay off or medical leave. Numerous male employees had jobs to return to after significant medical leave was taken. I however was treated disparately in that when Tishman then opened 5 additional interior, push button, elevator cars I should have been but was not offered any one of those positions. Instead, based on my gender and prior complaints of a hostile work environment, Tishman hired five male workers all of whom were less senior.

On the basis of the foregoing, I am supplementing my prior EEOC Charge of Discrimination dated January 9, 2014 (No. 520-2104000881) to assert a claim based on the unlawful refusal to re-employ me (also in violation of Respondents' past practice and policy) in continuing violation of my rights to be free from discrimination on account of my gender and disability and in retaliation for my having opposed discriminatory practices under Title VII and the New York State Executive Law.